

REDACTED STATEMENT OF PROBABLE CAUSE

I, Jessica Lynn France, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am and have been employed as a Special Agent of the Federal Bureau of Investigation ("FBI") since February 2015. While employed as an FBI Special Agent, I have been responsible for investigating violations of federal criminal laws over which the FBI has jurisdiction. As part of my duties as an FBI agent, I investigate criminal violations relating to civil rights threats including violations of hate crimes and interstate threat statutes. I have gained experience through training at the FBI Academy, including training pertaining to civil rights threats. As such, I am an investigative or law enforcement agent of the United States authorized under Title 18, United States Code, Section 3052, that is, an officer of the United States who is empowered by law to conduct investigations, to make arrests, and to collect evidence for various violations of federal law.

2. I am currently assigned to the FBI Phoenix Field Office's public corruption and civil rights squad. During my tenure with the FBI, I have participated in investigations involving threats made using telephones and electronic media, to include threats made via email. I have participated in all aspects of investigations including executing search warrants involving, among other things, the search and seizure of cellular phones, computer equipment, software, and electronically stored information. Through my experience and training, I have become familiar with activities of individuals engaged in illegal activities, to include their techniques, methods, language, and terms. During my career, my investigations have included the use of various surveillance techniques and the execution of numerous search and seizure warrants, including for computers and cellular telephones, and arrest warrants.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, witnesses, and agencies. I have reviewed documents and records related to this investigation, and I have communicated with others who have personal knowledge of the events and circumstances described herein. This Affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and arrest warrant. It does not set forth all of my knowledge, or the knowledge of others, about this matter.

4. Based on my training and experience and the facts as set forth in this Affidavit, I submit that there is probable cause to believe that Jeffrey Mindock ("MINDOCK") has committed a violation of 18 U.S.C. § 875(c), Interstate Threats.

PROBABLE CAUSE

5. The FBI is investigating threats made over interstate communications, specifically a threatening email sent to Senior Rabbi A.G. (Victim 1), a rabbi at a local Jewish synagogue in Scottsdale, Arizona. The investigation concerns violations of, *inter alia*, 18 U.S.C. § 875(c), Interstate Threats, involving threatening communications made via email on November 3, 2023.

6. On November 3, 2023, at approximately 8:42 AM, Victim 1 received an email at Redacted, from sender Jeffrey Mindock at email jdjeff@proton.me. The Subject Line of the email read: "HITLER WAS RIGHT RABBI Redacted (Case #23150[XXXX])," with the capitalization in the original. The body of the email stated:

Redacted

As I have watched the atrocities unfolding in Palestine, I have come to the realization that YOU people are to blame for everything evil in this world. Zionist Jews control everything from the courts to the banks to the media.

We both know that you are in control. I am giving you until midnight tonight to convince your servant, Utah Fifth District Court Judge [judge's last name] (Case # 23150[XXXX]) to drop the charges against me. If you do not use your influence to right this wrong I will execute you and every other JEW I can find tonight at midnight of your Sabbath.

If you wish to communicate with me further, I will only meet in person. 1958 E Greenway Dr. in Tempe, Arizona.

Shalom,

Viktor Sitkevicz

Sent with Proton Mail secure email.

7. On November 3, 2023, the affiant emailed Proton Mail support for an exigent request; however, a response was received indicating the inquiry may not be resolved for 24 hours. I know based on my training and experience, and discussions with other agents, that an email address ending in “@proton.me” would be an email address hosted by Proton Mail, a company headquartered in Geneva, Switzerland, who according to their public website has a primary data center in Zurich, Switzerland and that hosts its servers in Switzerland. Therefore, there is probable cause that the Proton Mail email address used by Mindock here caused the message to be transmitted in interstate or foreign commerce.

8. Queries of Arizona Motor Vehicle Division identified Jeffrey V Mindock as being located at 1958 E Greenway Dr, Tempe, Arizona, with a date of birth in July XX, 1973.

9. A Maricopa County Sheriff's Office (MSCO) report dated August 16, 2023, revealed Jeffrey Victor Mindock using, sitkevicz966@proton.me, emailed a threatening communication to Attorney M.B. and Utah courts, addressed to Judge J.W., Fifth District Court Judge of the Utah State Courts. The email read: Race TRAITOR “Judge” [judge's full name] will

die. I want the court to schedule a hearing/execution date where I will execute Zionist sympathizer "Judge" [judge's full name] for his crimes against his own race. He had decided to aid the israelites in persecuting me with this injunction. He will hang from the gallows for this crime. M.[], I am in Utah today if you would like to meet. "Judge" [judge's last name], if you would like to discuss alternatives to your death you can contact me in writing: 1958 E. Greenway Dr. Tempe, AZ 85282, signed Jeffrey Mindock, sent with Proton Mail secure email. Maricopa County Sheriff's Office provided several email addresses used by Mindock, including but not limited to sitkevicz966@proton.me and jdmindock@proton.me.

10. FBI database research conducted on Mindock revealed an FBI investigation conducted in October 2021, wherein Mindock threatened to kill J.H. (Victim 2) and that Mindock indicated he had enough guns, ammunition and explosives to kill ten swat teams. Mindock stated, "he knew how to make bombs." Tempe Police Department arrested Mindock on November 18, 2021. During Mindock's first court appearance, Mindock threatened Judge M.B. (Victim 3), stating, "he was going to execute [Victim 2 and 3], if [Victim 3] ruled against him." Mindock claimed to be a sovereign citizen and that Ted Kaczynski was his hero.

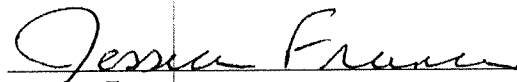
11. FBI database research conducted on Mindock also revealed a complaint generated in August 2020, wherein Mindock stated that his neighbor, Victim 1, was weaponizing the police against Mindock. Mindock stated that he will not comply with the police, and he is tired of the police coming to his house. Mindock stated that if the police come to his house, he is not going to go quietly, and that the police may have to shoot him. Mindock stated, "it is going to end badly for him." Mindock believes the police are threatening his life and stated that he always carries a gun.

12. Since approximately 2020, Mindock has been emailing threatening communications via Proton Mail, which is known as a private email service owned by a foreign entity. Some of the email addresses used by Mindock include but are not limited to sitkevicz966@proton.me and jdmindock@proton.me. Mindock voluntarily provided his Tempe, Arizona, residence location within the threatening emails and also used his alias name Vicktor Sitkevicz. Mindock's threatening communications have targeted an Arizona Rabbi leader, a Utah State District Court Judge and an individual within the Arizona community. The email communication threats made by Mindock contain language that Mindock will execute, hang and kill these individuals.

CONCLUSION

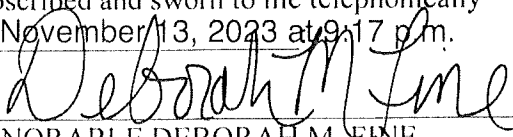
13. For these reasons, I submit that there is probable cause to believe that on November 3, 2023, Mindock did knowingly transmit in interstate and foreign commerce, with intent to threaten, an email communication message containing threats to injure and kill (Victim 1), a local Jewish leader from Scottsdale, Arizona, and others, including "every other JEW I can find tonight at midnight of your Sabbath", in violation of 18 U.S.C. § 875(c), Interstate Threats.

Respectfully submitted,



Jessica France
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to me telephonically
on November 13, 2023 at 9:17 p.m.



HONORABLE DEBORAH M. FINE
United States Magistrate Judge